

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

DAVID SAMBRANO, individually and on
behalf of all others similarly situated, *et al.*,

Plaintiffs,

v.

UNITED AIRLINES, INC.,

Defendant.

Civil Action No.: 4:21-cv-01074-P

**SUPPLEMENTAL APPENDIX IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR CLASS CERTIFICATION**

Plaintiffs file this Supplemental Appendix in Support of Plaintiffs' Reply in Support of Motion for Class Certification and, in support thereof, show the Court as follows:

APPENDIX INDEX

EX. NO.	DESCRIPTION	SUPP. APP. NOS.
1	CCS Priority: Flight Operations: <i>Updated: Countries with vaccination restrictions (expiration March 31, 2023)</i> , UNITED_SAMBRANO_00002079–80	1–3
2	United Airlines Human Resources, Upload your COVID-19 vaccination record, UNITED_SAMBRANO_00005618	4–5
3	Emails (12/10/22–12/12/22), <i>CCS Priority Message: Updated: Countries with vaccination restrictions</i> , UNITED_SAMBRANO_00006870–71	6–8
4	Deposition Transcript, United Airlines 30(b)(6) by Wm. Kirk Limacher, 11/6/23 [excerpted] (redacted)	9–13
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February 23, 2024

Respectfully submitted,

/s/ Mark R. Paoletta

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CERTIFICATE OF SERVICE

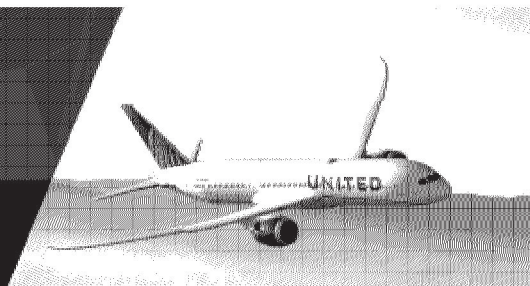
A true and correct copy of the foregoing has been served via the Court's electronic filing system upon all counsel of record and a copy has been provided to Defendant's counsel.

/s/ Brian J. Field
Brian J. Field

EXHIBIT 1

CCS Priority

Flight Operations



Title **UPDATED:** Countries with vaccination restrictions
Issued to A targeted list of 279 pilots
Expiration date March 31 , 2023

*This message is **information only** for the March 2023 bid periods. This information is subject to change at any time.*

Accommodation update:

Some foreign governments continue to maintain various COVID-19 rules or restrictions that prohibit, restrict, or otherwise interfere with the Company's ability to staff flights with unvaccinated pilots. As a reminder, while your reasonable accommodation allowed you to return to work, you are prohibited from monthly bid preferencing for restricted destinations – more specifically, you are required to include an avoid statement for each of the restricted destinations at the top of every PBS bid group. In addition, you are prohibited from picking-up or trading into any trips with flights to restricted destinations. If you end up with a trip(s) that includes a flight to any of the restricted destinations, you will be removed from the trip without pay and may be subject to discipline if you acquired the trip as a result of failing to follow the prohibitions/requirements above.

NOTE: This list is based on individual country restrictions and may change at any time. For the most up-to-date information about country-specific entry requirements, go to *Pilot Mobile/Stations (input station)/ Door Code/C-19 RESTR.*

Unauthorized to fly:

Colombia
Federated States of Micronesia
Marshall Islands
Palau
Philippines
Singapore

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Any unauthorized use, dissemination or copying of this message is prohibited.

EXHIBIT 2

Upload your COVID-19 vaccination record



United team member,

Your current record indicates that as of the morning of Tuesday, August 24, you haven't yet uploaded a complete record of your COVID-19 vaccination. **If you've been vaccinated but haven't uploaded all your information, please do so.** Please note that if you received a two-dose course, you need to upload a record of each dose (i.e., not just the record of dose two).

If you haven't been vaccinated yet, getting the vaccine ensures you're doing your part to keep yourself, your family, your friends and your colleagues healthy. As a reminder, **every U.S.-based United employee is required to receive a COVID-19 vaccine and upload their complete vaccination record to [MyInfo](#) by September 27, 2021.**

The last date you can begin Moderna vaccination is August 30, 2021, and the last date for Pfizer is September 6, 2021. That allows you enough time to receive the second of two doses of either vaccine on September 27, 2021. For the Johnson & Johnson vaccine, which is a one-dose vaccine, the last date you can get vaccinated is on the deadline of September 27, 2021.

If you would like to request a reasonable accommodation (RAP) on either a medical or religious basis, the deadline to submit a RAP request is August 31, 2021, which will allow sufficient time for processing ahead of the requirement due date. If you currently have a RAP pending review, we're moving through RAP determinations as quickly as possible, but please note that your leader won't know the status of your RAP until the process is completed.

For those employees who upload their records to Flying Together by September 20, we'll offer an additional day of pay in a November paycheck. United pilots and flight attendants who have already received an opportunity for union-negotiated compensation for uploading their vaccine records are not eligible.

If you have any questions or issues during the upload process, you can submit a Help Hub inquiry [here](#) and refer to the COVID-19 vaccine FAQ [here](#), as well as the [COVID-19 Flying Together homepage](#).

Thank you for all you continue to do to take care of our customers and one another.

United Human Resources

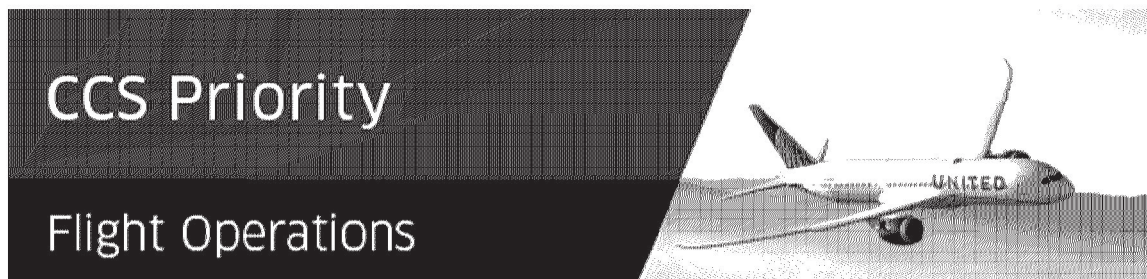
EXHIBIT 3

From: Nau, Sarah </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D7B332A4906A462289662C1C524B3B51-U355033>
To: DiCostanzo, Phil; Eisenberg, Nathan, Representation; Hanson, John - Alpa ; Mike Harrison; Schleder, John - Alpa
Sent: 12/12/2022 12:00:30 PM
Subject: FW: CCS Priority Message: Updated: Countries with vaccination restrictions
Attachments: image001.jpg; image003.jpg

Sarah Nau

Director of Labor Relations - Flight
United | Corporate Support Center
233 S. Wacker Drive, 25th Floor | Chicago, IL 60606
Tel 872-825-9669 | Cel 312-523-4700 | sarah.nau@united.com
united.com

From: Parker, Alexandra <alexandra.parker@united.com>
Sent: Saturday, December 10, 2022 4:38 PM
Cc: Warner, Jeffrey <Jeffrey.Warner@united.com>
Subject: CCS Priority Message: Updated: Countries with vaccination restrictions



Title	Updated: Countries with vaccination restrictions
Issued to	A targeted list of 281 pilots
Expiration date	January 31, 2023

*This message is **information only** for the January 2023 bid period.
This information is subject to change at any time.*

Accommodation update:

Some foreign governments continue to maintain various COVID-19 rules or restrictions that prohibit, restrict, or otherwise interfere with the Company's ability to staff flights with unvaccinated pilots. As a reminder, while your reasonable accommodation allowed you to return to work, you are prohibited from monthly bid preferencing for restricted destinations – more specifically, you are required to include an avoid statement for each of the restricted destinations at the top of every PBS bid group. In addition, you are prohibited from picking-up or trading into any trips with flights to restricted destinations. If you end up with a trip(s) that includes a flight to any of the restricted destinations, you will be removed from the trip without pay and may be subject to discipline if you acquired the trip as a result of failing to follow the prohibitions/requirements above.

NOTE: This list is based on individual country restrictions and may change at any time. For the most up-to-date information about country-specific entry requirements, go to *Pilot Mobile > Stations (input station) > Door Codes > C-19 RESTR.*

Unauthorized to fly:

China
Colombia
Federated States of Micronesia
Marshall Islands
Nigeria
Palau
Philippines
Singapore

Countries may impose restrictions on crew movements during layovers. It is the responsibility of each individual crew member to maintain compliance with any such restrictions.

If you need further assistance, please reach out to your Chief Pilot's Office.

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The information contained in this publication may be confidential.
Any unauthorized use, dissemination or copying of this message is prohibited.

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

DAVID SAMBRANO, individually and on)
behalf of all others similarly)
situated, et al.,)

Plaintiffs,)

vs.)

UNITED AIRLINES, INC.,)

Defendant.)

No. 4:21-01074-P

VIDEOTAPED DEPOSITION OF WILLIAM KIRK LIMACHER

Pursuant to Rule 30(b)(6) - Volume 1

Chicago, Illinois

Monday, November 6th, 2023

REPORTED BY: GREG S. WEILAND, CSR, RMR, CRR

JOB NO.: 6146533

[REDACTED PURSUANT TO CONFIDENTIAL
DESIGNATION BY UNITED AIRLINES]

Page 214

1

2

3

4

5

6

7

Q. Okay. We talked earlier about the return to work, and I'd like to circle back to that.

9

So in March of 2022, I believe -- actually, strike that. Let's ask one other thing first.

12

We talked about pilots from other airlines, flight attendants from other airlines.

13

14

What about contractors? Were there contractors and vendors who were in and out of the United workspace in airports or on airplanes that were not vaccinated?

15

16

17

18

A. Likely, yes.

19

20

Q. And could United have required that those vendors ensure that their employees are vaccinated before they interact with United employees?

21

22

A. Through procurement, we approached our contractors that had employees on place -- in place. And we encouraged them to only staff United, in the United account, with vaccinated individuals and

23

24

25

1 encouraged them to follow suit in terms of a vaccine
2 requirement since certain employees were subject to
3 the same risk.

4 Q. The question was, could United have
5 required it of a vendor whose employees were
6 interacting with United's employees?

7 A. Unilaterally, no.

8 Q. What about -- so when we get to the
9 return-to-work in March 2022, pilots, flight
10 attendants, and anyone else on unpaid leave was
11 called back, correct?

12 A. Correct.

13 Q. What is your understanding -- or strike
14 that.

15 You understand that pilots and flight
16 attendants when they returned were not able to bid
17 on every available flight, correct?

18 A. You're referring to restricted countries?
19 Is that what you're referring to?

20 Q. Yeah, restricted countries or cities.

21 Or what limitations were imposed on pilots
22 and flight attendants when they returned to work?

23 A. And I think I'm just getting confused.

24 Q. Okay.

25 A. It wasn't about their return to work that

C E R T I F I C A T E

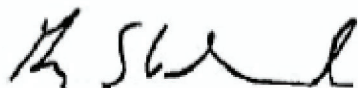
The within and foregoing deposition of the witness, WILLIAM KIRK LIMACHER, was taken before GREG S. WEILAND, CSR, RMR, CRR, at Suite 4800, 110 North Wacker Drive, in the City of Chicago, Cook County, Illinois, commencing at 9:05 o'clock a.m., on the 6th day of November, 2023.

The said witness was first duly sworn and was then examined upon oral interrogatories; the questions and answers were taken down in shorthand by the undersigned, acting as stenographer; and the within and foregoing is a true, accurate and complete record of all the questions asked of and answers made by the aforementioned witness at the time and place hereinabove referred to.

The signature of the witness was not waived and the deposition was submitted to the deponent as per copy of the attached letter.

The undersigned is not interested in the within case, nor of kin or counsel to any of the parties.

Witness my signature on this 13th day of



GREG S. WEILAND, CSR, RMR, CRR

License No. 084-003472

EXHIBIT 5

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
Fort Worth Division

DAVID SAMBRANO, et al.,) Civil Action No.
individually, and on) 4:21-cv-01074-P
behalf of all others)
similarly situated,)
Plaintiffs,)
vs.)
UNITED AIRLINES, INC.,)
Defendant.)

Videotaped Deposition of
AMBER DAVIS
October 24, 2023
10:29 a.m.

Reported by: Bonnie L. Russo
Job No. 6143279

1 BY MR. MAUGERI:

2 Q. So to just re-ask the question
3 before the break, were you aware that while on
4 unpaid leave United pilots had the ability to
5 apply preferentially to open jobs elsewhere in
6 the airline?

7 A. They told us that we could apply.

8 Q. And did you make any efforts while
9 on unpaid leave to research potentially
10 available jobs elsewhere in the airline?

11 A. Yes. I applied for a special
12 assignment position.

13 Q. And what was the nature of that
14 special assignment position that you applied
15 for?

16 A. It's a pilot special position. It
17 works in the chief pilot's office.

18 Q. And what are the job duties for --
19 for that type of role?

20 A. They handle more of managerial
21 aspects of it. They make the phone calls to
22 pilots that need maybe badging or reminders of

1 medicals or something. They handle different
2 just administrative issues inside the chief
3 pilot's office.

4 Q. And were you awarded that job?

5 A. It was instantly denied.

6 Q. And describe for me what you mean by
7 "instantly denied."

8 A. It was an online application, and in
9 the question marks, it asked: Are you
10 vaccinated? which I responded no. And when I
11 hit the submit, I had an automatic response:
12 You have been denied.

13 Q. Did you make any efforts after
14 receiving that response to follow up with
15 United to see if, despite your unvaccinated
16 status, you might have been qualified for that
17 special position?

18 A. No. I believe that was very
19 intentional on their part, so I did not follow
20 through.

21 Q. But so you didn't take any steps to
22 reach out to determine whether that was a

1 mistake or intentional?

2 A. I believed it to be very
3 intentional.

4 Q. But, again, you didn't ask anyone
5 and you didn't make any follow-up?

6 A. Correct.

7 Q. What other jobs were you aware that
8 you could have potentially applied for on
9 unpaid leave at United?

10 A. I was told that we could apply for
11 jobs, such as the ramp personnel, but I was
12 told that if you do, you are giving up your
13 pilot position forever, as you may never come
14 back as a pilot. You would now be a ramper.

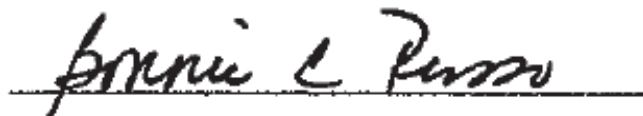
15 Q. Who at United communicated to you
16 that you might lose your position as a captain?

17 A. I believe that was communicated
18 through Flying Together or hub -- HelpHub. I
19 just remember being scared of it like it's not
20 a viable option.

21 Q. Did anyone communicate to you
22 individually to advise you that you might not

CERTIFICATE OF NOTARY PUBLIC

I, Bonnie L. Russo, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in shorthand and thereafter reduced to computerized transcription under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

A handwritten signature in black ink, reading "Bonnie L. Russo", is written over a horizontal line.

Notary Public in and for
the District of Columbia

My Commission expires: August 14, 2025

EXHIBIT 6

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
Fort Worth Division

DAVID SAMBRANO, et al.,) Civil Action No.
individually, and on) 4:21-cv-01074-P
behalf of all others)
similarly situated,)
Plaintiffs,)
vs.)
UNITED AIRLINES, INC.,)
Defendant.)

Videotaped Deposition of
KAITLYN A. HOVILA
October 23, 2023
9:44 a.m.

Reported by: Bonnie L. Russo
Job No. 6143257

1 A. No.

2 Q. You only submitted a letter from
3 Calvary Chapel in Hawaii, correct?

4 A. Correct.

5 Q. When did you become a member of the
6 online congregation at Calvary Chapel Hawaii?

7 A. In the -- I don't know. I've
8 been -- we've been watching them for a while,
9 so I want to say maybe the end of 2022 -- I
10 mean, not 2022, the end of 2020.

11 Q. And, first off, you said we, so are
12 you referring to your husband or who else?

13 A. No, just me and my family. My
14 husband has heard of him, but I was not married
15 at the time.

16 Q. Okay. So you and your parents would
17 watch J.D. Farag's videos from Calvary Chapel
18 in the 2020 and 2021 time frame?

19 A. Yes.

20 Q. How frequently would you watch his
21 videos?

22 A. Maybe once or twice a month.

1 Did you take any steps -- well, let
2 me back up.

3 Are you aware that United informed
4 employees such as yourself on unpaid leave due
5 to a reasonable accommodation that you had the
6 right to preferentially apply to any open job
7 while on leave?

8 A. Yes.

9 Q. And did you apply to any open jobs
10 while on unpaid leave at United?

11 A. Did I apply? No. Did I look at
12 them? Yes.

13 Q. Approximately how many job openings
14 at United did you review while on unpaid leave?

15 A. I don't know. Three or four.

16 Q. What do you remember about those
17 jobs?

18 A. That they were based in Dulles.

19 Q. So were you limiting your search to
20 jobs that were based in Dulles?

21 A. Yes.

22 Q. Did anyone at United tell you that

1 you needed to limit your search to jobs based
2 in Dulles?

3 A. No.

4 Q. So you were aware that when you were
5 on unpaid leave not only did United allow you
6 to preferentially apply to jobs but you could
7 have applied to jobs anywhere in the country,
8 right?

9 A. To my knowledge, yes.

10 Q. But you didn't choose to do that,
11 did you?

12 A. No.

13 Q. And the three or four -- the -- the
14 handful of jobs that you did review in Dulles,
15 why didn't you apply to them?

16 A. Because there was no guarantee that
17 I could come back as a flight attendant.

18 Q. And so you just made -- so you made
19 the decision that you preferred to be on unpaid
20 leave and wait it out to come back as a flight
21 attendant as opposed to taking a job and
22 starting to earn a paycheck right away,

1 correct?

2 MR. FIELD: Object to form.

3 THE WITNESS: Correct. There was no
4 guarantee that you were even going to get that
5 job, though.

6 BY MR. MAUGERI:

7 Q. But you didn't even take steps to
8 apply to any of those jobs, did you?

9 A. Not to my knowledge.

10 Q. And what -- what types of jobs were
11 these several jobs that you looked at in
12 Dulles?

13 A. I remember one was ground crew,
14 bagging I think. I can't really remember the
15 others, but they weren't dealing with the
16 public.

17 Q. Did you understand at the time that
18 the reason the jobs that you were being offered
19 didn't deal with the public was that United was
20 trying to take unvaccinated flight attendants
21 away from the public?

22 A. I realized that.

CERTIFICATE OF COURT REPORTER

I, Bonnie L. Russo, do hereby certify that the foregoing transcript is a true record of the proceedings to the best of my ability, that I am not related to or employed by any of the parties involved in these proceedings, and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or financially interested in the proceedings.

A handwritten signature in black ink, reading "Bonnie L. Russo", is written over a horizontal line.

Bonnie Russo

EXHIBIT 7

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

DAVID SAMBRANO, et al.,)
individually, and on)
behalf of all others)
similarly situated,)
) Civil Action No.
Plaintiffs,) 4:21-cv-01074-P
)
v.)
)
UNITED AIRLINES, INC.,)
)
Defendant.)

ORAL AND VIDEOTAPED DEPOSITION OF
GENISE KINCANNON
SEPTEMBER 22, 2023

ORAL AND VIDEOTAPED DEPOSITION OF GENISE KINCANNON,
produced as a witness at the instance of the Defendant,
and duly sworn, was taken in the above-styled and
numbered cause on the 22nd day of September, 2023, from
9:27 a.m. to 2:41 p.m., before Julie C. Brandt, RMR,
CRR, and CSR in and for the State of Texas, reported by
machine shorthand at Kelly Hart & Hallman, LLP, 201 Main
Street, Suite 2500, Fort Worth, Texas, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto.

1 Q. The reason that's important, Ms. Kincannon, is
2 if I ask you a question and you give us an answer today
3 and I ask you the same question when we try this case
4 and your answer is different, I might ask you why your
5 answers are different.

6 Do you understand that?

7 A. I understand.

8 Q. Where do you live?

9 A. In Fort Worth. You need the address?

10 Q. What's your address?

11 A. 5545 Grenada Drive, G-R-E-N-A-D-A.

12 Q. What's the zip there?

13 A. 76119.

14 Q. How long have you lived there?

15 A. Moved there in 2009.

16 Q. Do you still have a mortgage on the home?

17 A. Not now.

18 Q. It's paid off?

19 A. We did when we went through this.

20 Q. When you say you went through this, what do
21 you mean?

22 A. When I was placed on leave, indefinite leave,
23 we didn't know where any income was going to come, so my
24 husband borrowed money against his 401(k) and paid the
25 house off.

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF TEXAS
3 FORT WORTH DIVISION

4 DAVID SAMBRANO, et al.,)
5 individually, and on)
6 behalf of all others)
7 similarly situated,)
8) Civil Action No.
9 Plaintiffs,) 4:21-cv-01074-P
10)
11 v.)
12)
13 UNITED AIRLINES, INC.,)
14)
15 Defendant.)

16 REPORTER'S CERTIFICATION
17 VIDEOTAPED DEPOSITION OF GENISE KINCANNON
18 SEPTEMBER 22, 2023

19 I, Julie C. Brandt, Certified Shorthand Reporter in
20 and for the State of Texas, hereby certify to the
21 following:

22 That the witness, GENISE KINCANNON, was duly sworn
23 by the officer and that the transcript of the oral
24 deposition is a true record of the testimony given by
25 the witness;

Before completion of the deposition, review of the
transcript [] was [X] was not requested. If requested,
any changes made by the deponent (and provided to the
reporter) during the period allowed are appended hereto;

1 That the amount of time used by each party at the
2 deposition is as follows:

3 Russell Cawyer.....03 HOUR(S):47 MINUTE(S)

4 Cristina Squiers.....00 HOUR(S):00 MINUTE(S)

5 That pursuant to information given to the
6 deposition officer at the time said testimony was taken,
7 the following includes counsel for all parties of
8 record:

9 FOR THE PLAINTIFFS:

10 Cristina Squiers
11 SCHAERR JAFFE, LLP
12 1717 K Street NW, Suite 900
13 Washington, DC 20006
14 202-787-1060
15 csquiers@schaerr-jaffe.com

16 -and-

17 John C. Sullivan
18 SL LAW, PLLC
19 610 Uptown Blvd., Suite 2000
20 Cedar Hill, Texas 75104
21 john.sullivan@the-sl-lawfirm.com

22 FOR THE DEFENDANT:

23 Russell D. Cawyer
24 Taylor Winn
25 KELLY HART & HALLMAN LLP

1 201 Main Street, Suite 2500
2 Fort Worth, Texas 76102
3 817-878-3562
4 russell.cawyer@kellyhart.com
5 taylor.winn@kellyhart.com

6 I further certify that I am neither counsel for,
7 related to, nor employed by any of the parties or
8 attorneys in the action in which this proceeding was
9 taken, and further that I am not financially or
10 otherwise interested in the outcome of the action.

11 Certified to by me October 6, 2023.

12
13 
14

15 Julie C. Brandt, CSR, RMR, CRR
16 Texas CSR No. 4018
Expiration Date: 10/31/23

17 Veritext Legal Solutions
Firm Registration No. 571
300 Throckmorton Street, Suite 1600
18 Fort Worth, Texas 76102
817-336-3042
19
20
21
22
23
24
25

EXHIBIT 8

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

DAVID SAMBRANO, individually and on
behalf of all others similarly situated, *et al.*,

Plaintiffs,

v.

No.: 4:21-cv-01074-P

UNITED AIRLINES, INC.,

Defendant.

SECOND SUPPLEMENTAL DECLARATION OF DAVID SAMBRANO

I, David Sambrano, declare as follows:

1. I provide this second supplemental declaration in support of Plaintiffs' class certification reply brief. In particular, I address United's argument that I was offered a Special Assignment ("SA") position, and I explain why I was unable to fill that position.
2. On the same date as the Fifth Circuit heard oral argument in this case, January 3, 2022, I received a call from a friend at United—Captain Rob Galbraith—asking if we could talk briefly about whether I would be interested in an SA position. In his call, Capt. Galbraith did not reference this position as an accommodation. In fact, he never referenced my status as an "accommodated" United employee when discussing this SA position, not did I receive any formal offer from Capt. Galbraith. Rather, we only discussed his wanting me to do some SA work.

3. I was concerned about the SA position because offering it to me at that time seemed to be far outside the normal procedure. For instance, SA positions are highly sought after, and they have strict requirements. Pilots must apply for the positions during one of the two open periods each year when applications are accepted. When Capt. Galbraith called me, I do not recall submitting an application during the previous application period, and therefore could not be considered for an SA position.

4. Additionally, in order to receive an SA position, a pilot must be current, which means having performed 3 takeoffs and landings in the past 90 days. At the time of Capt. Galbraith's call, I was not current.

5. Further, SA positions are only available to "active pilots." But I was not "active" at the time, as I was on forced unpaid leave.

6. For all of these reasons, I was concerned about the impact of potentially accepting a position for which I was not qualified and for which the application process had not been followed. Accordingly, I let Capt. Galbraith know my concerns and he said he would pass those on to HR. Also, at the same time, I was providing care for a family member, which would have made that particular position difficult. Hence my reference to it not being the right time.

7. Only after I informed Capt. Galbraith about my concerns that I was not qualified for this position did HR contact me to suggest that this was part of the accommodation process. HR never explained how I was qualified for this position, and there was never an explanation for why United was contacting me about a SA position when the SA application window was not open.

8. Accordingly, I maintained that I could not accept such a position for which I was not qualified.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

4/24/2024
Date


David Sambrano